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9
10 **UNITED STATES DISTRICT COURT**
11
12 **DISTRICT OF NEVADA**

13 COLLEGIUM FUND SERIES 32, a Nevada
14 limited-liability company,

15 v.
16 Plaintiff,

17 MARK DANIEL SNYDER, an individual;
18 WELL'S FARGO BANK, N.A.; DOES I
THROUGH X; and ROE
CORPORATIONS 1 THROUGH 10,

19 Defendants.

20 Case No.: 2:16-cv-01640-JCM-PAL

21 **STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
FEDERAL HOME LOAN
MORTGAGE CORPORATION'S
MOTION FOR SUMMARY
JUDGMENT**

22 **(FIRST REQUEST)**

23 WELL'S FARGO BANK, N.A., a national
banking association,

24 v.
25 Counter-Claimants,

26 COLLEGIUM FUND SERIES 32, a Nevada
limited-liability company, ABSOLUTE
COLLECTION SERVICES, LLC, a Nevada
limited liability company; NUEVO VISTA
HOMEOWNERS ASSOCIATION, INC., a
Nevada non-profit cooperative corporation,

27 Counter-Defendants.

1 FEDERAL HOME LOAN MORTGAGE
2 CORPORATION,

3 Counter-Claimants,

4 v.

5 COLLEGIUM FUND SERIES 32, a Nevada
6 limited-liability company, ABSOLUTE
7 COLLECTION SERVICES, LLC, a Nevada
8 limited liability company; NUEVO VISTA
9 HOMEOWNERS ASSOCIATION, INC., a
10 Nevada non-profit cooperative corporation,

11 Counter-Defendants.

12 Wells Fargo Bank, N.A. (“Wells Fargo”), Federal Home Loan Mortgage Corporation
13 (“Freddie Mac”), Collegium Fund Series 32 (“Collegium Fund”), Absolute Collection Services, LLC
14 (“ACS”), and Nuevo Vista Homeowners Association, Inc. (the “HOA”), by and through their
15 respective counsel, hereby respectfully request that the Court enter an order, pursuant to Local Rules
16 6-1 and 7-1, extending the time for Collegium Fund, ACS, and the HOA to respond to the Motion
17 for Summary Judgment (the “MSJ”) filed by Freddie Mac on January 17, 2017 [ECF No. 26] and
18 joined by Wells Fargo on January 20, 2017 [ECF No. 29]. The response to the MSJ is currently due
19 on February 7, 2017. The Parties have agreed to extend this response date to March 7, 2017.

20 The extension is being sought in good faith and will not unduly delay this litigation. This
21 request is made based on the volume of litigation currently pending on related matters. Additionally,
22 Collegium Fund, the HOA, and ACS would like some additional time to review the discovery
23 responses previously provided by Wells Fargo and Freddie Mac to respond to the MSJ.

24 Accordingly, the Parties respectfully request that the Court grant this Stipulation and extend
25 the time to respond to the MSJ from February 7, 2017 to March 7, 2017.

26 DATED this 6th day of February, 2017.

27 CONNAGHAN|NEWBERRY

28 /s/ Paul Connaghan (with permission)

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/s/ Nathan Kanute

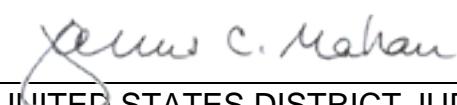
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2 ABSOLUTE COLLECTION SERVICES, LLC PENGILLY LAW FIRM

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15 Attorneys for Nuevo Vista HOA

16 **IT IS SO ORDERED.**

17 
18 UNITED STATES DISTRICT JUDGE

19 DATED: February 7, 2017

20 Snell & Wilmer
21 L.L.P.
22 LAW OFFICES
23 500 West Liberty Street, Suite 510
24 Reno, Nevada 89501
25 775.785.5440
26
27
28

CERTIFICATE OF SERVICE

As an employee of Snell & Wilmer L.L.P., I certify that I served a copy of the foregoing
**STIPULATION AND ORDER TO EXTEND TIME TO OBJECT TO THE FEDERAL
HOME LOAN MORTGAGE CORPORATION'S MOTION FOR SUMMARY JUDGMENT**
on the 6th day of February, 2017 by the method indicated:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada addressed as set forth below.
- BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- BY PERSONAL DELIVERY:** by causing personal delivery by _____, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

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